

BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the matter of:

*Numbering Resource Optimization*

*Qwest Communications Corporation, on  
Behalf of its IP-Enabled Services  
Operations, Petition for Limited Waiver  
of Section 52.15(g)(2)(i) of the  
Commission's Rules Regarding Access to  
Numbering Resources*

CC Docket No. 99-200

REPLY COMMENTS OF THE CALIFORNIA PUBLIC UTILITIES  
COMMISSION AND OF THE PEOPLE OF THE STATE OF CALIFORNIA

RANDOLPH WU  
HELEN M. MICKIEWICZ  
NATALIE D. WALES

Attorneys for the  
Public Utilities Commission

California Public Utilities Commission  
505 Van Ness Ave.  
San Francisco, CA 94102  
Phone: (415) 355-5490

June 20, 2005

Fax: (415) 703-2262

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**REPLY COMMENTS OF THE CALIFORNIA PUBLIC UTILITIES  
COMMISSION AND OF THE PEOPLE OF THE STATE OF CALIFORNIA**

The California Public Utilities Commission and the People of the State of California (the CPUC or California) respectfully submit these Reply Comments to the Federal Communications Commission (FCC or Commission) pursuant to the May 4, 2005 Public Notice seeking comment on the Petition for Limited Waiver of 47 C.F.R. § 52.12(g)(2)(i) filed by Qwest Communications Corporation (Qwest) on March 29, 2005.<sup>1</sup>

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<sup>1</sup> Section 52.12(g)(2)(i) requires that an applicant for numbers provide evidence that it has state

The CPUC continues to have reservations about the granting of any limited waivers of 47 C.F.R. § 52.12(g)(2)(i). At the same time, in light of the Commission's decision to grant a waiver to SBC Internet Services, Inc. (SBCIS),<sup>2</sup> the CPUC does not oppose this petition in the interests of fairness, and to the extent that Qwest's request is similar to that of SBCIS' and seeks the same relief as SBCIS. In comments on similar petitions filed subsequent to the Commission's *SBCIS Order*, the CPUC took this same position after a discussion of the many concerns raised by the limited waivers of this numbering requirement.<sup>3</sup> To the extent that providers of IP-enabled services seek the same limited waiver in the future, the CPUC respectfully requests that the Commission

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authority to provide telephone service in the relevant geographic area.

<sup>2</sup> *Administration of the North American Numbering Plan*, CC Docket No. 99-200, *Order* (FCC 05-20) (rel. February 1, 2005) (*SBCIS Order*).

<sup>3</sup> *See* Comments Of The California Public Utilities Commission And Of The People Of The State Of California On Petitions For Limited Waiver (April 11, 2005) (CPUC Comments on Six Petitions for Limited Waiver); Reply Comments Of The California Public Utilities Commission And Of The People Of The State Of California On Petitions For Limited Waiver (April 26, 2005) (CPUC Reply Comments on Six Petitions for Limited Waiver).

take notice of the CPUC's previously-filed comments in this docket.<sup>4</sup> The CPUC reserves the right, however, to reconsider issues in the event of changes in law, policy, or factual circumstances, as well as to comment on new issues that may be raised by future petitions.

Respectfully submitted,

RANDOLPH WU  
HELEN M. MICKIEWICZ  
NATALIE D. WALES

/s/ NATALIE D. WALES

By:

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Natalie D. Wales

Attorneys for the  
Public Utilities Commission

California Public Utilities Commission  
505 Van Ness Ave.  
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<sup>4</sup> Reply Comments Of The California Public Utilities Commission And Of The People Of The State Of California On SBCIP Petition For Limited Waiver (August 31, 2004); CPUC Comments on Six Petitions for Limited Waiver, and; CPUC Reply Comments on Six Petitions for Limited Waiver.

